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### **Attorneys for Plaintiffs**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal corporation,

Defendant.

Case No. 3:20-cv-00917-HZ

DECLARATION OF GABRIEL TRUMBLY IN  
SUPPORT OF PETITION FOR TEMPORARY  
RESTRANING ORDER

I, Gabriel Trumbly, declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
2. I am currently a resident of Portland, OR. I am a Portland State University student, in student government, a Paralegal, and the owner of a small photography business.
3. I have been curious about the reality of protests for the past few years. I have recorded other major protests. I always go as just an observer and recorder; I do not partake in any form of protest, and I will talk to people on all sides of the issues being protested.
4. I filmed the linked video on June 1, 2020, on SW 4<sup>th</sup> Ave., between Salmon and Taylor Streets.
5. The video is accessible here: <https://youtu.be/4Naoau6hUY4>
6. Below is a description of my experience, which you can see in the video.
7. I went out on May 31, 2020, and was inspired by the peaceful protest, and the fact that the police seemed to leave the march across the bridge completely alone.
8. On June 1, 2020, a friend from PSU student government and I went to Pioneer Square to check out the demonstration and get some good videos and photos.
9. While at Pioneer Square, we heard that the police had indicated that there was criminal activity a block away. As the crowd shifted there, my friend and I did as well.
10. I recorded video at the fence on SW 4<sup>th</sup>, between Salmon and Taylor. I observed police wearing full gas masks with shaded eyes, and no nametags stand motionless

as protesters yelled, some profanity, some chants, and some asking reasonable questions, like “What’s your badge number?” and “What’s your name?” No officers responded to anyone in the crowd.

11. Portland Police then began ordering the crowd to leave the fenced area. After a few announcements, the crowd started moving up Taylor St. and away from the fence. As we were walking up Taylor, from 4<sup>th</sup> to 5<sup>th</sup>, I saw the crowd halted by a wall of police. Again, some of the crowd yelled profanity and some chanted.
12. The police then shot tear gas over my head, trapping me in between the police line and the tear gas. Then there were more explosions and more tear gas. I could barely see as my eyes watered and burned and my lungs felt like they were filling with fire. I powered through the panic that sinks in when you feel like you can’t breathe.
13. As I collected myself, I found myself trapped between a fence I was told to leave, and a wall of tear gas that would make me feel like I was suffocating. I decided to sit there and collect myself, wait for the gas to dissipate, and get my friend home, because what was happening seemed like too much for her. I looked around and saw people doubled over, spraying water, and milk in their eyes.
14. Then, on a loudspeaker behind me, I was ordered to leave. I asked, “where am I supposed to go?” After asking this twice, I heard a real person on the loudspeaker ordering me to go North, under threat of more tear gas, impact munitions, and/or arrest. I was dumbfounded that my government was ordering me to choose either the pain and feeling like I am suffocating again from the tear gas or face more violence and arrest. As I was walking through the clouds of chemicals, I was then ordered by another officer to walk back through the tear gas the other way.

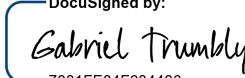
15. After that, my friend understandably went home, which many others also choose to do. I believe that that was the goal of the Portland Police. As I waited with her for her ride to come, I reflected on what had happened. A crowd of American citizens who were protesting police brutality were lured into a dead end at a fence that I saw the Portland Police reposition only an hour earlier. We were then chased out of the dead end by threats of violence or arrest. We were immediately chased back into the dead end by chemicals that made me feel like I was dying. Then we were ordered, under threat of more violence, to walk back into tear gas.

16. I am generally not black and white about things. But these actions by the police were unacceptable. This was plain wrong.

17. How am I supposed to trust my government after that string of events? I am now interested and engaged even more, and I am now watching and recording every night. I wanted to be a prosecutor before because I thought police just needed a little more accountability from the people they work with daily, at least in Portland. I now have no idea where to even begin; the PPB, MCSO, and OSP are acting like 5<sup>th</sup> grade bullies, and using military tactics to beat the will to protest for change out of its citizens.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 9, 2020.

DocuSigned by:  
  
Gabriel Trumbly  
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Gabriel Trumbly